

1 William J. Goines (SBN 061290)  
Alisha M. Louie (SBN 240863)  
2 GREENBERG TRAURIG, LLP  
1900 University Avenue, Fifth Floor  
3 East Palo Alto, CA 94303  
Telephone: (650) 328-8500  
4 Facsimile: (650) 328-8508  
Email: goinesw@gtlaw.com  
5 louiea@gtlaw.com

6 Jeremy A. Meier (SBN 139849)  
GREENBERG TRAURIG, LLP  
7 1201 K Street, Suite 1100  
Sacramento, CA 95814-3938  
8 Telephone: (916) 442-1111  
Facsimile: (916) 448-1709  
9 Email: meierj@gtlaw.com

10 Brian S. Cousin (Pro Hac Vice)  
Neil A. Capobianco (Pro Hac Vice)  
11 GREENBERG TRAURIG, LLP  
MetLife Building, 200 Park Avenue  
12 New York, NY 10166  
Telephone: (212) 801-9200  
13 Facsimile: (212) 801-6400  
Email: cousinb@gtlaw.com  
14 capobiancon@gtlaw.com

15 Attorneys for Defendants Polo Ralph Lauren  
Corporation; Polo Retail, LLC; Polo Ralph Lauren  
16 Corporation, doing business in California as Polo Retail  
Corporation; and Fashions Outlet of America, Inc.  
17

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 ANN OTSUKA, an individual; JANIS KEEFE,  
an individual; CORINNE PHIPPS, and  
21 individual; and JUSTIN KISER, an individual;  
22 and on behalf of all others similarly situated,

23 Plaintiff,  
v.

24 POLO RALPH LAUREN CORPORATION, a  
Delaware Corporation; et al.,

25 Defendants.

26 AND RELATED CROSS-ACTIONS.  
27  
28

Case No. C07-02780 SI

**STIPULATION FOR FILING OF  
SECOND AMENDED COMPLAINT**

Dept: Courtroom 10, 19<sup>th</sup> Fl.  
Judge: Hon. Susan Illston

1 Based on the stipulation of counsel and good cause appearing therefore, IT IS HEREBY  
2 ORDERED, Plaintiffs are hereby granted leave of Court to file their Second Amended  
3 Complaint, attached hereto as **Exhibit A**.

4  
5 Dated: \_\_\_\_\_, 2007.



6 HON. SUSAN ILLSTON

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 IT IS HEREBY STIPULATED by and between the parties hereto through their  
2 respective attorneys of record, and with the Court's permission, that Plaintiffs may file a  
3 Second Amended Complaint, a copy of which is attached hereto as **Exhibit A**.

4 By this Stipulation, Defendants are reserving their rights to assert any and all defenses  
5 to the Second Amended Complaint, including those provided for under the Federal Rules of  
6 Civil Procedure.

7  
8 Dated: 10-18, 2007.

GREENBERG TRAURIG, LLP

9  
10 By: William J. Goines  
11 William J. Goines  
12 Jeremy A. Meier  
Alisha Louie

13 Attorney for Defendants Polo Ralph Lauren  
14 Corporation; Polo Retail, LLC; Polo Ralph  
15 Lauren Corporation, doing business in  
California as Polo Retail Corporation; and  
Fashions Outlet of America, Inc

16 Dated: 10-18, 2007.

The Law Office of Patrick R. Kitchin

17  
18 By: Patrick R. Kitchin, Esq.  
19 Patrick R. Kitchin, Esq.  
20 Attorney for Plaintiffs Corinne Phipps, Janis  
Keefe, Justin Kiser and Renee Davis  
(proposed Plaintiff)

21  
22 Dated: \_\_\_\_\_, 2007.

The Law Offices of Daniel Feder

23  
24 By: \_\_\_\_\_  
25 Daniel Feder, Esq.  
26 Attorney for Attorney for Plaintiff Ann Otsuka  
27  
28